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June 1, 2022

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. As per Your Honor's direction in the Order of March 31, 2022, we are providing a joint status report.

As previously reported, an extended mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) resulted in a Settlement Agreement between the parties. The parties continue to work jointly to effectuate the settlement and enlist Judge Cavanaugh's assistance as needed. We respectfully propose updating the Court again in August 2022.

Respectfully,

/s/ James J. O'Hara

JAMES J. O'HARA
On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Kevin Laukaitis

KEVIN LAUKAITIS
On behalf of Plaintiffs

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)